

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	CIVIL ACTION NO. 23-99J
)	
v.)	JUDGE HAINES
)	
TIMOTHY BRITTON,)	
)	
BRITTON ENTERPRISES, LLC)	<i>(Electronic Filing)</i>
D/B/A TIM'S APARTMENTS,)	
)	
Defendants.)	

JOINT MOTION FOR STAY OF LITIGATION

The parties to this action, through their counsel, jointly move for an Order to stay litigation, and, in support thereof, aver as follows:

1. The parties have completed fact discovery on February 14, 2025, pursuant to the Court Order filed on January 14, 2025. (ECF No. 51). The United States has completed discovery, with the exception of a possible motion to compel.

2. The parties reached a settlement in principle at the second mediation on June 10, 2024.

3. Counsel for the defendants has informed counsel for the United States that underwriting for one of two loans needed to cover the agreed upon damages was approved, and the second is still awaiting final approval. In addition, the parties are continuing to confer to finalize the terms of the proposed consent order. There is only one current issue that has not yet been resolved.

4. Counsel for the defendants has informed counsel for the United States that he will be attending a four-week trial in Erie, Pennsylvania in March and will be largely unavailable during this time.

5. Counsel for both parties conferred and are jointly requesting a stay of litigation until the end of April to finalize a settlement.

6. Should this Honorable Court grant this stay, litigation would continue beginning on May 1, 2025.

7. Neither party will be prejudiced by the granting of this Motion.

WHEREFORE, the parties respectfully request a stay of litigation to April 30, 2025. A proposed form of order is attached.

Respectfully submitted,

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